

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.

NATIONAL GRANGE MUTUAL
INSURANCE COMPANY, as subrogee of
ENGINEERING DESIGN ASSOCIATES,
Plaintiff

v.

CITY OF SPRINGFIELD and
SPRINGFIELD WATER AND SEWER
COMMISSION,
Defendants

FILING FEE PAID:

RECEIPT # 305752

AMOUNT \$ 50.00

BY EPTY CLK MHA

DATE 10/5/04

MOTION FOR ADMISSION PRO HAC VICE

The plaintiff respectfully moves the Court for the admission of Sean P. O'Donnell, Esquire, *pro hac vice*, for all activities in the above-referenced matter and in support thereof sets forth the following:

1. Mr. O'Donnell is a resident of the State of Pennsylvania. Mr. O'Donnell has been a practicing attorney in Pennsylvania for 9 years. Mr. O'Donnell is a member of the law firm of Cozen O'Connor, 1900 Market Street, Philadelphia, Pennsylvania 19103.

2. Mr. O'Donnell is a member in good standing of the State Bar of Pennsylvania, duly licensed and admitted to practice law in that jurisdiction. Mr. O'Donnell's Pennsylvania attorney identification number is 76533.

3. There are no disciplinary proceedings or criminal charges instituted or pending against Mr. O'Donnell in Pennsylvania or any other jurisdiction.

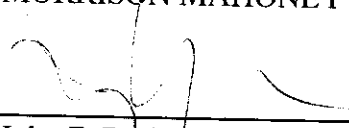
4. Mr. O'Donnell is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

5. If the Court shall allow Mr. O'Donnell's application to appear *pro hac vice* in the above-captioned matter, Mr. O'Donnell will represent his client in this proceeding together with the undersigned counsel, a member of the Bar of this Court, until the final determination thereof, and with reference to all matters, incidents or proceedings, he will agree that he shall be subject to the orders and amenable to disciplinary action and the civil jurisdiction of this Court in all respects as if he were a regularly admitted and licensed member of the Bar of this Court in good standing.

WHEREFORE, plaintiff, National Grange Mutual Insurance Company, respectfully requests this Court admit Sean P. O'Donnell, *pro hac vice* in this matter to assist with the undersigned counsel in all pre-trial and trial proceedings.

The Plaintiff,
NATIONAL GRANGE MUTUAL INSURANCE
COMPANY

By Its Attorneys,
MORRISON MAHONEY LLP



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